

## Office for Child Nutrition

# DIRECT CERTIFICATION MANUAL 2014-2015

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**DIRECT CERTIFICATION MANUAL  
2014-2015**

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## **DIRECT CERTIFICATION FACT SHEET**

### **What is Direct Certification?**

The Ohio Department of Education (ODE), Office for Child Nutrition (OCN) provides Local Education Agencies (LEA)/Sponsors the opportunity of directly certifying enrolled students for free meal benefits in the National School Lunch and School Breakfast Programs.

Section 9 of the Richard B. Russell National School Lunch Act mandates all LEAs who collect Free and Reduced Price Student Meal Applications to participate in direct certification and permits direct verification of children in food stamp households.

Through conducting the Direct Certification process, LEAs have reported that they were (1) providing more free meal benefits as a result of picking up new eligible students who formerly did not apply and (2) verifying fewer applications, thus saving a significant amount of time.

The United States Department of Agriculture (USDA) now requires all LEAs who collect Free and Reduced Price Student Meal Applications to complete the Direct Certification process three times a year. USDA suggests that the process should be conducted at the following intervals:

- At or around the beginning of the school year (**must occur after July 1<sup>st</sup> to count for the 2015 school year**);
- Three months after the initial effort; and
- Six months after the initial effort.

### **Who is eligible to participate in Direct Certification?**

All LEAs/Sponsors who collect Free and Reduced Price Student Meal Applications must participate in Direct Certification.

### **What steps must an eligible school take to participate in Direct Certification?**

Refer to the Action Steps part of this package (page 4).

### **When will the information be available to participating schools?**

LEAs must complete the Direct Certification process by using an online secure Direct Certification software system within the Claims Reimbursement and Reporting System (CRRS). LEAs must utilize the software to complete the Direct Certification match process. LEAs are no longer required to contact their local Information Technology Center (ITC) for the Direct Certification information. Computer disks will not be sent to LEAs. ODE, OCN will publish an updated Ohio Supplemental Nutrition Assistance Program (SNAP, formally the Food Stamp program) list into the system once a month.

As such, LEAs will have the ability to complete the Direct Certification process on a monthly basis, if desired. Appendix B: Direct Certification Screen Shots Document provided on pages 22-23 of this document provides a step by step instruction on completing the process.

### **What features will an LEA notice in completing the Direct Certification Process in School Year 2014-2015?**

1. State agencies are required to report to FNS a SNAP-only direct certification count starting in SY 2014-2015 for all SFAs required to conduct direct certification. To ensure that data is reported as accurately as possible, the USDA provides additional instructions for those State agencies not prepared to report a SNAP-only direct certification count for all SFAs required to conduct direct certification in SY in 2014-2015.

*(For additional instructions, see USDA Memo Code: SP20-2014, 2/4/2014, Pg. 1-2)*

2. Schools operating provision 2/3 in a base year are required to collect individual household applications and conduct direct certification. Data for base year schools should be reported the same as schools processing applications and conducting direct certification.

*(For additional instructions, see USDA Memo Code: SP20-2014, 2/4/2014, Pg. 2)*

3. Children enrolled in schools participating in provision 2/3 in a non-base year or in Community Eligibility Provision (CEP) are receiving free meals through the provision and not through the process of direct certification. States are required to report SNAP match data for students in CEP and non-base year provision 2/3 schools **separately** from schools not operating special provision or base year schools to properly account for the number of students receiving SNAP benefits for direct certification performance estimates.

*(For additional instructions, see USDA Memo Code: SP20-2014, 2/4/2014, Pg. 2-3)*

4. State agencies are strongly encouraged to **review the detailed guidance in SP54-2013**.
5. "Search": A new tab has been added which allows user to search for individual students.

### **Where can a school find more information about Direct Certification?**

LEAs may reference the USDA Eligibility Guidance for School Meals (revised August 2014) available at [www.education.ohio.gov](http://www.education.ohio.gov) under *Fact Sheets/Guidance/Manuals, NSLP*.

## DIRECT CERTIFICATION ACTION STEPS

1. Answer the Direct Certification assurance question on the “Sponsor Application” in the 2015 program year application in CRRS system. This assurance statement is the guarantee to ODE that the LEA will keep confidential, at all times, the list of students who are eligible for free meal benefits, and that the information will be used for school meal program purposes only.
  - a. **Please note that the 2015 CRRS Sponsor application requires a date of first Direct Certification completion for the school year. Please** enter the actual date that the Direct certification list is run, do NOT enter a projected a date of completion.
2. LEAs will need to prepare an electronic copy of their student enrollment database. The electronic student enrollment file prepared by the LEA must meet the Direct Certification Input File Requirements as published in the Input File Requirements document on page 10 of this guidance manual.
3. A LEA representative with a CRRS user name and password will log-in to CRRS, click on “National School Lunch Program,” and select “Direct Certification” in the menu of options that appears on the left side of the screen.
4. The LEA representative will follow the prompts in CRRS to access the Direct Certification software system.
5. Once the Direct Certification software is accessed, the student enrollment file that the LEA prepared can be uploaded into the Direct Certification software system or the user can click on the “search” tab in the system to enter the information for an individual student.
6. Once the Direct Certification software system completes the match process, a results report will be available to the LEA. The LEA will have a choice to generate the results report in either a text (txt) or excel file format.
  - The results report **MUST** be saved in an electronic file format and/or paper copy and maintained by the LEA for three years plus the current school year.
  - If the user clicks on the “search” tab and enters information for an individual student, the user must print a copy of the screen that shows that the individual student record produced a match. The user will know that an individual student record matched if a green checkmark appears at the bottom of the screen (as opposed to a red X mark which indicates no match).

7. Send a Direct Certification Eligibility Notification Letter to the household, using an approved confidential method. The notification letter informs households that they need not complete a paper student meal application, the Directly Certified student remains eligible for the entire school year, and the household has the option to refuse benefits. NOTE: A prototype Eligibility Notification Letter is provided on page 11.
8. Attempt to identify additional enrolled students that reside in a household with a Directly Certified student. Any additional students residing in a household with a Directly Certified student can be extended the Direct Certification benefits. See page 8 of this guidance manual for additional details.
9. Maintain a listing of Directly Certified students by building.
10. Update Directly Certified student information as changes occur.

## **DIRECT CERTIFICATION PROCEDURES**

### **1. RECORDKEEPING**

A copy of the results reports and screen shots for individual student look-up certifications generated from the Direct Certification software system must be kept on file for three years after the current school year and until audits are concluded and resolved.

### **2. CONFIDENTIALITY**

ODE and the LEA agree that they shall not use any information, systems, or records made available to either party for any purpose other than to fulfill the obligations specified within the agreement. These parties agree to be bound by the same standards of confidentiality that apply to the employees of either party or the State of Ohio. Only authorized School Meal Program personnel will have access to the records.

Every household with students who have been directly certified must be given the option to refuse the benefits.

### **3. DIRECT CERTIFICATION INFORMATION**

- (a)** The name of students that are certified eligible to receive free meals through the use this data should be compiled by the LEA and a confidential list compiled on a school-by-school basis.
- (b)** The data on which Direct Certification is based will be considered valid for the entire school year. The LEA is not required to update this data during the school year.

### **4. LOCAL EDUCATION AGENCY APPROVED HOUSEHOLD NOTIFICATION METHODS**

**METHOD A** - Before the start of the school year, letters are mailed to the homes of all students.

- (1)** Households with students who have been directly certified will receive a letter indicating that their children have been approved for free school meals. See the prototype Eligibility Notification letter on page 11.
- (2)** All other households will receive the Letter to Households and Free and Reduced Price School Meals Application as they have received in past years. (Download prototypes of these documents from the ODE, OCN Website.)

**METHOD B** - Before the start of the school year, letters will be mailed only to households with students who have been directly certified for free school meals. The letter will state there is no need to fill out an application. All students, including directly certified students, are given a Free and Reduced-Price School Meals application.

**METHOD C** - At the beginning of the school year all students receive a sealed addressed letter.

- (1) Households, with students who have been directly certified, will receive a letter indicating that their students have been approved for free school meals (see page 11).
- (2) All other households will receive the Letter to Households and Free and Reduced Price School Meals Application as they have received in past years.

The above listed materials must be distributed in a manner that protects the identification of students eligible under Direct Certification. The student's name must be on the envelope.

**NOTE:** Additional copies of the Letter to Household and Free and Reduced-Price School Meals application must be available in the LEA's central office and in each school to accommodate new enrollees and students with changes in eligibility.

## **EXTENDING CATEGORICAL ELIGIBILITY TO ADDITIONAL CHILDREN IN A HOUSEHOLD**

LEAs must extend eligibility for free meals to all students in what would be considered a “family” for the purposes of applying for free or reduced price meals or free milk.

A “family” is defined, for the purposes of applying for free or reduced price meals or free milk, as a group of related or nonrelated individuals, who are not residents of an institution or boarding house, but who are living as one economic unit.

To address the Direct Certification process, if one child in a family is directly certified, the LEA must use district enrollment records, a submitted Free and Reduced Price Application, or other school documentation as a reference to determine if there are additional students who are part of the family who were not identified through direct certification.

If the LEA determines that there are additional students in the family, the LEA must directly certify these students for free meals without further need for submission of a meal application and notify the household accordingly.

For the purposes of an audit or Coordinated Review Effort (CRE), the LEA must make available the documentation that was used to determine that additional students were in the family.

For additional guidance on extending categorical eligibility to additional children in a household, please reference USDA policy memo SP 25-2010 Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household in appendix A of this document.

## **DIRECT CERTIFICATION QUESTIONS AND ANSWERS**

### **1. What constitutes a match?**

When **(1)** the student is confirmed to be enrolled and **(2)** at least two identifiers match; for example, full name (last name and first name) and birthdate.

### **2. Does a sibling of a directly certified student need to complete an application?**

If the school cannot obtain enrollment records to verify that a sibling lives in the same household as the student that is directly certified, then the family may complete a separate student meal application to verify the children live in the same household.

**3. What happens to applications submitted after a student has been directly certified?**

Direct Certification takes priority over an application. The application should be removed from the files and destroyed unless the application is serving as documentation to prove the existence of other students in the household for the purposes of extending direct certification benefits as described in the Extending Categorical Eligibility to Additional Children in the Household section of this document, found on page 8.

**4. Who do I call for help with computer related questions?**

Call the ODE, OCN School Meal Programs help line at 1-800-808-6325.

**5. Who do I call for help with questions regarding processing Direct Certification lists or processing Free and reduced Price Student Meal Applications?**

Call your ODE, OCN School Meal Programs Regional Consultant at 1-800-808-6325.

**6. Can Direct Certification Information be used for Provision 2?**

Yes, schools participating in Provision 2 may use Direct Certification data to qualify free students in the base year. In non-base years, eligibility information is not necessary for operation of Provision 2 and Direct Certification may not be conducted under National School Lunch Act authority. Exceptions include schools using Provision 2 only for the School Breakfast Program (and still conducting Direct Certification for the National School Lunch Program) and schools conducting Direct Certification in the last year of a Provision 2 cycle to develop socioeconomic data of the school's population for purposes of requesting an extension.

**7. Do directly certified students become eligible for verification?**

No, only 3 percent of the number of approved paper applications as of Oct. 1 must be verified. The names of the students pre-approved by Direct Certification and any siblings Directly Certified by the LEA through enrollment records are not part of this sample.

**8. How long must Direct Certification related information be kept?**

All Direct Certification documentation must be kept for three years, plus the current year.

## IMPORT FILE REQUIREMENTS

For the upload to be successful the input file must be **tab-delimited text file**. The first line of the file must contain the following field names and affiliated data for each enrolled child: lastname, firstname, and dateofbirth. Users may now add any of the below field names with affiliated data into the input file. Adding additional fields will help improve the Direct Certification match success rate as the additional fields will be considered by the system if lastname, firstname and dateofbirth do not result in a solid match for a given student. Note: the system will no longer provide partial match results.

Here is the list of field names which may be included in the input file:

### Field Names

- lastname (required)
- firstname (required)
- dateofbirth (required)
- middleinitial
- parentlastname
- parentfirstname
- parentmiddleinitial
- address1
- address2
- city
- state
- zip
- childgender
- phonenumber

**Prototype Direct Certification Eligibility Notification Letter  
(Put on Sponsor Letterhead)**

**NATIONAL SCHOOL LUNCH AND BREAKFAST PROGRAM  
ELIGIBILITY NOTIFICATION LETTER**

Date:

Dear Parent/Guardian:

The National School Lunch and Breakfast Act allows school districts to directly certify students as eligible for free school meals using Food Assistance Program (SNAP, formally known as Food Stamps) or Ohio Works First (OWF) information. Each student identified below is automatically approved for free meals based on his or her eligibility for SNAP or OWF or due to the SNAP or OWF eligibility of a sibling in the household. Please do not fill out a Free or Reduced-Price School Meals Application for this (these) student(s).

Student Name	Address	School	Grade
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If any of the information listed above is incorrect, or if you have any questions, please contact the school office.

**FREE HEALTH CARE:** Families with children eligible for school meal benefits may be eligible for FREE health care coverage through Ohio’s Healthy Start & Healthy Families programs. These programs include coverage for doctor visits, immunizations, physicals, prescriptions, dental, vision, mental health, substance abuse and more. Please call **1-800-324-8680** for more information or to request an application. Information can also be found on the web at <http://jfs.ohio.gov/ohp/bcps/hshf/index.stm>. **\*Please Note: If you have an Ohio Medicaid Card, you are already getting these services.**

Sincerely,

Local School Official

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If you **DO NOT** want your student to receive these school meal benefits, please fill out, detach, and return the statement below to this office.

DATE:

I DO NOT want my student (student's name) to receive free meals.

Signature of parent or guardian.



**United States  
Department of  
Agriculture**

Food and  
Nutrition  
Service

3101 Park  
Center Drive  
Alexandria, VA  
22302-1500

**DATE:** May 3, 2010

**MEMO CODE:** SP 25 -2010; CACFP 11 -2010; SFSP 10 -2010

**SUBJECT:** Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household

**TO:** Regional Directors  
Child Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

This memorandum provides questions and answers relating to policy memorandum SP 38-2009, CACFP 08-2009, SFSP 07-2009, Extending Categorical Eligibility to Additional Children in a Household, dated August 27, 2009..That memorandum extended categorical eligibility for free meals or free milk for children who are members of a household receiving assistance from the Supplemental Nutrition Assistance Program (SNAP), the Food Distribution Program on Indian Reservations (FDPIR) or the Temporary Assistance to Needy Families (TANF) Program. All Child Nutrition Programs are subject to this policy.

These questions and answers respond to inquiries received from regional offices and State agencies. Because School Year 2009-2010 is nearly over, we did not include questions that only addressed implementation of this policy. We will update the Eligibility Manual for School Meals and the prototype application to reflect this policy prior to the next school year.

State agencies should contact their regional office if they have any questions.

**Original Signed**

Cynthia Long  
Director  
Child Nutrition Division

Attachment

The following are definitions of the terms used in this memorandum.

**“Household”** and **“family”** are used as defined in 7 CFR 245.2 and as they relate to economic units as discussed in Part 4, Section B of the Eligibility Manual for School Meals; in this memorandum, these terms are used interchangeably.

**“Extended or extension of eligibility”** means that all children or adults in the household who are participating in one or more of the Child Nutrition Programs are categorically eligible for free meals if any child or adult receiving SNAP, FDPIR or TANF benefits is a member of that household. Any child or adult receiving SNAP, FDPIR or TANF benefits is always categorically eligible for free meals and their eligibility extends to all household members attending school or participating in the Child and Adult Care Food Program (CACFP) or the Summer Food Service Program (SFSP).

## **DETERMINING ELIGIBILITY**

### **Q1. How does an LEA apply this policy to applications submitted by households?**

If an LEA receives an application listing at least one SNAP, TANF, or FDPIR case number for any member of the household, the LEA must certify all children listed on the application as categorically eligible for free meals.

### **Q2. How should LEAs apply this policy to their direct certification procedures?**

At a minimum, the notice provided to families indicating that a child has been directly certified for free meals must explain how the household can report any additional children in the household who are not listed on the notice. LEAs are encouraged to establish other methods to identify additional children in a household with one or more children who are directly certified. See the section of this document entitled “DETERMINING AND DOCUMENTING ADDITIONAL HOUSEHOLD MEMBERS” for ways to identify additional children.

### **Q3. During a school year, an LEA may learn (for example, from the household) that, although one child in the family was directly certified, additional children in the family are not receiving free meal benefits. When would free meal benefits begin for the additional children who were not identified through the direct certification process?**

Benefits would begin on the date these children are certified as eligible. The children are not eligible for retroactive benefits, and the LEA cannot claim free meals for these children retroactively. This also applies to children who become eligible for SNAP, FDPIR, or TANF benefits or who submit an application with a case number during the school year.

## **APPLICABILITY**

**Q4. If a child is categorically eligible for free meals based on enrollment in Head Start, or certification as a homeless, runaway, or migrant child, is eligibility extended to other children in the household?**

No. This policy applies only to children receiving SNAP, FDPIR, or TANF benefits.

**Q5. Does extension of eligibility apply to direct certification and applications with SNAP, FDPIR, or TANF benefits case numbers?**

Yes.

**Q6. In some households, the only person receiving SNAP, FDPIR, or TANF benefits may be an adult. Does the adult's eligibility extend to the children in the household?**

Yes. Although they are not required to determine if there are adult household members receiving SNAP, FDPIR or TANF benefits, LEAs are encouraged to revise school meal applications to indicate that providing a single case number for any member of the household will establish eligibility for all children in the family.

**Q7. If a household member receives SNAP, FDPIR or TANF benefits but does not participate in any child nutrition program or attend school, does that person's eligibility extend to a child in the household who attends school?**

Yes, if the child attending school is a member of the same household as the person receiving SNAP, FDPIR or TANF benefits, the child attending school is categorically eligible for free meals. Although the LEA is not required to determine if there are such children in a household, the LEA must extend eligibility if it becomes aware of other household members receiving SNAP, FDPIR or TANF benefits. (See also Q and A 14.) Also, as noted above, LEAs are encouraged to revise school meal applications to indicate that providing a single case number for any member of the household will establish eligibility for all children in the family.

**Q8. How does this policy relate to the concept of economic unit?**

This policy was not intended to change the definitions of "Family" or "Household" in 7 CFR. Family and Household are defined as a group of related or unrelated individuals living together as an economic unit. Therefore, the child who is receiving SNAP, FDPIR or TANF benefits may only "extend" status to other children in the same economic unit.

## **DETERMINING AND DOCUMENTING ADDITIONAL HOUSEHOLD MEMBERS**

**Q9. The initial policy memo states that if the LEA does not have an application as a reference, it may use school district enrollment information to determine additional children who are part of the household. How would the LEA locate additional children?**

To the extent practicable, LEAs should use household composition information that may be available from the school district. Once children have been identified through the direct certification process, schools can search the records of the directly certified children to identify additional children in the household. LEAs also may receive from the State SNAP agency lists of children who are household members of those directly certified. The LEA can then use school district enrollment information to determine whether any of these children attend school within the LEA. Additional household members also may be identified by an adult member of the household.

**Q10. What identifiers should the LEA use to establish additional household members? What documentation is required?**

It is up to the LEA to determine identifiers for locating additional household members, but parents' names, home addresses, and other specific household indicators, if available, may be the most useful. Acceptable documentation includes school meal applications indicating at least one case number, school district enrollment records identifying all children in the household, custody agreements, information that may be provided by the SNAP, FDPIR or TANF agencies, or information from school officials such as principals or teachers. LEAs also may request that an adult member attest to the household composition as discussed in Q and A 17.

**Q11. If children in a household are enrolled in both public and private schools, how is information shared to extend eligibility? Are the public schools and private schools required to identify additional children in the household?**

LEAs are not required to identify additional children in the household who are outside of their own school district. However, public and private LEAs are encouraged to share information to the extent practicable.

**Q12. When an LEA extends eligibility within the first 30 operating days of the new school year to a sibling who is new to the LEA (i.e., enrolled in kindergarten), what documentation is required?**

The LEA should annotate the application or direct certification record to add the sibling and indicate how the determination to extend eligibility to the new student was made (e.g., address match, information from school officials, etc.).

**Q13. In an effort to identify all students in the household of a student who is directly certified, can LEAs use addresses to match children? If software can match addresses, is this sufficient identification or must parents' names, or other identifiers also be used?**

An address match may be sufficient to identify additional eligible children if the LEA determines that only one household resides at that address. LEAs also may use parents' names, parents' social security numbers, or other identifiers to assist in identifying additional children.

**Q14. We may have an address match but other information indicates that more than one household lives at that address or that the address is a multi-unit complex. Does an address match justify extending eligibility when there may be multiple households living at the same address?**

If the LEA is aware that more than one household resides at an address, it should confirm through available records which students reside with children who receive SNAP, TANF or FDPIR benefits. The LEA may need to contact the households to determine their composition and establish eligibility.

#### **EXTENDING AND DOCUMENTING EXTENDED ELIGIBILITY**

**Q15. A child is determined eligible for free meals because he/she is a member of a household with someone directly certified or who has a SNAP, FDPIR, or TANF case number listed on the application. If that child resides in another household during the certification period, does this policy apply to any children in the second household?**

No. While that child retains free meal status for the remainder of the certification period, if he/she moves to another household, eligibility is not extended to others. Free meal eligibility based on receipt of SNAP, FDPIR, or TANF benefits can be extended only to other children who are in the same household as the child receiving SNAP, FDPIR or TANF benefits.

**Q16. A child's parents have shared physical custody during the certification period. How does this policy apply if only one parent's household receives SNAP, FDPIR or TANF benefits?**

If a child is determined eligible for free meals because he/she receives SNAP, FDPIR or TANF benefits in one parent's household, he/she retains eligibility for free meals regardless of where the child is living for the remainder of the certification period. When that child is residing in the second parent's household, the child is a member of that household and because he/she was determined eligible for free meals based on receipt of SNAP, FDPIR or TANF benefits, eligibility extends to other children in that household.

If a child is not determined eligible for free meals based on his/her own receipt of SNAP, FDPIR, or TANF benefits, but on the extended eligibility from another family member in the first parent's household, eligibility is not extended to other members of the second parent's household.

**Q17. How should the LEA document extended status?**

Children in a household with a child or adult receiving SNAP, FDPIR or TANF benefits are considered eligible on the same basis (directly certified or case number) as the person(s) receiving benefits.

However, LEAs must have some record of the basis of eligibility in order to properly apply this policy in the event that a child moves to a new household and for review purposes. Further, when eligibility is extended to additional household members at the request of the household and there is no application currently on file, an adult household member must attest to the household size and membership if agency or school district records are not available. This would happen, for example, if only one child was identified through direct certification and the LEA was unable to identify any other school-age children. In these situations, the LEA could either:

- have an adult member attest to the household composition by signing a statement listing all members of the household with the attesting statement for the application for free and reduced price meals and milk (see 7 CFR 245.6(a)(9) and Part 2, Section F. of the Eligibility for School Meals Manual); or, when there are other records used to extend eligibility, such as an application or school districts records, the LEA must indicate on the application, roster, or other records which children are eligible based on extended eligibility.

If a child with extended eligibility moves from the household receiving SNAP, FDPIR or TANF benefits to a household not receiving these benefits, that child retains free meal eligibility for the remainder of the certification period. However, because eligibility cannot be extended by this child, the LEA must note, using one of the methods above, extended eligibility for that child when adding that child to the new household.

**Q18. If an LEA determines that additional children are eligible based on the direct certification match of one child, but the household did not file an application, how is the household notified?**

The LEA would include all children on the notification sent to the household regarding direct certification results.

**CHILD AND ADULT CARE FOOD PROGRAM (CACFP) SPECIFIC QUESTIONS**

**Q19. If one child in a household is receiving SNAP, FDPIR or TANF benefits, does that make all of the children in the household categorically eligible for free meals in the CACFP?**

Yes. Children receiving SNAP, TANF, or FDPIR benefits are categorically eligible for free meals in the CACFP. If one child in the household is receiving any of these benefits, categorical eligibility extends to the other children in the household.

**Q20. If a non-area eligible family day care home provider is not receiving SNAP, FDPIR or TANF benefits but a child in her household is receiving these benefits, is the provider eligible to receive CACFP tier I reimbursement rates?**

Yes. If at least one child in a household is receiving SNAP, FDPIR or TANF benefits and, therefore, is categorically eligible for free meals in CACFP, this categorical eligibility extends to the entire household. Therefore, a family day care home provider in that family would be considered eligible for tier I reimbursement rates based on the child's receipt of benefits.

**Q21. Under the CACFP, if a child who is receiving SNAP, FDPIR or TANF benefits moves in with a family that was not previously eligible for free meals or tier I rates, would that child's receipt of SNAP, TANF or FDPIR benefits extend categorical eligibility to the rest of the family? What if the child has moved from another State?**

Regardless of how a child becomes part of a household, the policy applies. Eligibility determinations are made at a point in time. As discussed in Q and A's 15 and 16, if a child moving to another household, even in another State is receiving SNAP, FDPIR, or TANF benefits, at that point in time the child is eligible for free meals and eligibility is retained for the duration of the certification period. Further, other children in the household become eligible for free meals based on that child's receipt of benefits and an adult member of the household providing family home day care services under CACFP would be eligible for tier I reimbursement rates.

**Q22. If an adult in the household participates in the Adult Day Care component of the CACFP and is categorically eligible based on receipt of SNAP, TANF or FDPIR benefits, does categorical eligibility extend to other children or adults in the household participating in a child nutrition program?**

Yes. The adult's eligibility extends to the other household members.

**Q23. What documentation must a child care institution have on file?**

As discussed in Q and A 17, documentation must be maintained indicating the basis for a child's eligibility for free meals. Generally, institutions should obtain an application which includes the SNAP, FDPIR or TANF case number of the recipient household member. Alternatively, if a child's eligibility is based on a school-age household member's receipt of benefits, the institution may maintain certification from the child's school that he or she is eligible for free or reduced price meals either through direct certification or application. See Q and A 17 for more detailed documentation alternatives.

## **VERIFICATION**

**Q24. Are applications for children who receive benefits as a result of this memo subject to verification?**

If benefits are extended based on an application with a SNAP, FDPIR or TANF benefits case number, the application is included in the sample and subject to verification. If an application is used only to record and confirm household composition where another child in the household has been directly certified, as discussed in Q and A 17, the application is not included in the sample or subject to verification because verification is not required for children identified through direct certification.

**Q25. For the purposes of the FNS-742, Verification Summary Report, how are children coded?**

Children who are eligible based on extended categorical eligibility are classified under the same category as the person who extended the eligibility. If the person who extended eligibility was directly certified, all children would be coded as directly certified. Likewise, if a child is listed on an application with a person's SNAP, FDPIR or TANF case number, then all children would be coded based on the provision of a case number.



United States  
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Food and  
Nutrition  
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DATE: April 27, 2011

MEMO CODE: SP 31-2011

SUBJECT: Frequency of Direct Certification Matching Activities Beginning in School Year 2011-2012

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

The interim rule, *Direct Certification and Certification of Homeless, Migrant and Runaway Children for Free School Meals*, was published on April 25, 2011. One of the provisions in this rule concerns the frequency of direct certification matching activities with the Supplemental Nutrition Assistance Program (SNAP) and is effective July 1, 2011. The provision, found at 7 CFR 245.6(b) (3), requires that direct certification matching activities with SNAP be done at least three times per school year:

- At or around the beginning of the school year;
- Three months after the initial effort; and
- Six months after the initial effort.

As discussed in the preamble of the interim rule, the purpose of the additional matching activities is to facilitate participation of children in the school meals programs and to work towards on-going direct certification with SNAP through computer matching. Please see the interim rule for additional information about this provision: (<http://www.fns.usda.gov/cnd/Governance/regulations/2011-04-25.pdf>)

We recognize that this is a very short deadline and want to assure State agencies and local educational agencies (LEAs) that we know that increasing the frequency of direct certification matching activities may need to be phased-in for some locations. We expect those State agencies and LEAs unable to accomplish SNAP direct certification at least three times in School Year (SY) 2011-2012, to work toward this goal and comply with the requirement no later than SY 2012-2013. Appropriate actions for SY 2011-2012 include:

- Revising agreements between the Child Nutrition State agency and the SNAP State agency to increase the frequency of matches annually;
- Budgeting and using any appropriate grant funds and other resources, such as State Administrative Expense funds, to support needed changes. (Information about

Regional Directors

State Directors

Page 2

available grant opportunities to improve direct certification are located on the FNS Child Nutrition Division's grant website at:

<http://www.fns.usda.gov/cnd/grants.htm>. Also refer to Memorandum SP 27-2011, Expansion of Opportunities for Additional States to Apply for Direct Certification Planning and Implementation Grants); and

- Requesting extensions of full compliance until SY 2012-2013, if needed.

We are working with SNAP to facilitate compliance with the requirement for increasing the frequency of direct certification matching activities. SNAP will work with their State agencies to promote cooperation. State agencies should direct any questions concerning this guidance to the appropriate FNS Regional Office Regional Offices should contact the Child Nutrition Division.

**Original Signed**

Cindy Long

Director

Child Nutrition Division

# 13. Direct Certification

All sponsors using free and reduced-price applications for meal eligibility determinations are required to complete the direct certification process three times per school year. The completion date of the first direct certification match process for the school year is captured when a sponsor completes an NSLP sponsor application form via CRRS, but sponsors are not required to report to ODE the dates of the two subsequent matches. However, sponsors must maintain all direct certification documentation, including direct certification match result reports, for three years plus the current school year for auditing purposes.

Sponsors must complete the direct certification match process by using the Children's Nutrition Direct Certification (CNDC) system, an online software system accessible via the Claims Reimbursement and Reporting System (CRRS). The **Direct Certification** feature of CRRS provides a link to the secure CNDC website, where you can upload and match data from your student enrollment file.

## 13.1. File Formatting

All student enrollment files uploaded to the CNDC website must be in a **tab-delimited** format — each data field must be separated from the next data field by a manual tab. The first line of the file **must contain** the field names **lastname**, **firstname**, and **dateofbirth**. Other field names that may be included in an input file are:

- middleinitial
- parentlastname
- parentfirstname
- parentmiddleinitial
- address1
- address2
- city
- state
- zip
- childgender
- phonenumber

Sponsors are encouraged to include any additional field names that might prove useful when importing the direct certification data into their student systems, such as `studentId` or `buildingIRN`. These additional field names will not be used in the matching process, but they will be present in the results file available for download.

Shown below is an example line from a fictitious tab-delimited school data file, where the right arrow symbol (→) represents a tab:

```
Jordan → Petra → I → 09011999 → F → Jordan → River → T → 100  
Shulamit Garden Drive → Ciudad → Ohio → 43215 → 6145555555 →  
090119 → 015789
```

## 13.2. Import a Direct Certification File

To import a direct certification file:

1. Log in to CRRS and select the **NSLP** module. Refer to the [Getting Started](#) chapter of this manual for guidance on logging in, if necessary.
2. In the left navigation menu, select **Direct Cert > Continue to DC App.** ([Figure 393](#)).

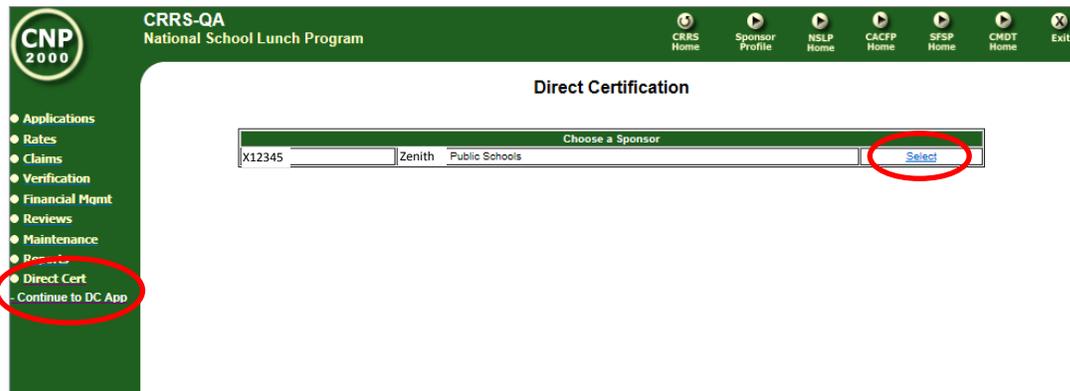


Figure 393. The Direct Certification sponsor selection screen.

3. The Direct Certification sponsor selection screen displays. Click the **Select** link. ([Figure 393](#)).
4. The Direct Certification portal link displays ([Figure 394](#)). Click the **Continue to the Direct Certification website** link.

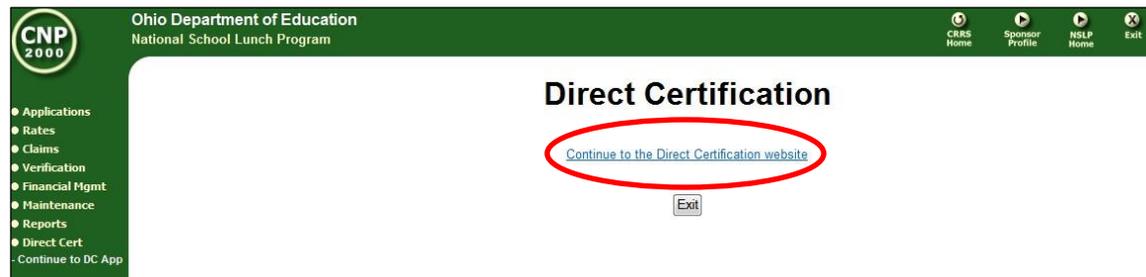


Figure 394. The Direct Certification portal link.

5. The Ohio Department of Education Children’s Nutrition Direct Certification (CNDC) Home page will display (Figure 395). Click the **Upload a File** button.



Figure 395. The Ohio Department of Education Childrens Nutrition Direct Certification home page.

6. A Choose File to Upload window will display and ask you to locate your input file on the local system. Select the desired file; then click the **Open** button.
7. The uploading process will begin immediately. When complete, the CNDC system will display an **Import Results** message, indicating that the file was successfully imported (Figure 396) or that errors occurred during the import (Figure 397).



Figure 396. An Import Results message indicating successful uploading of a direct certification file.

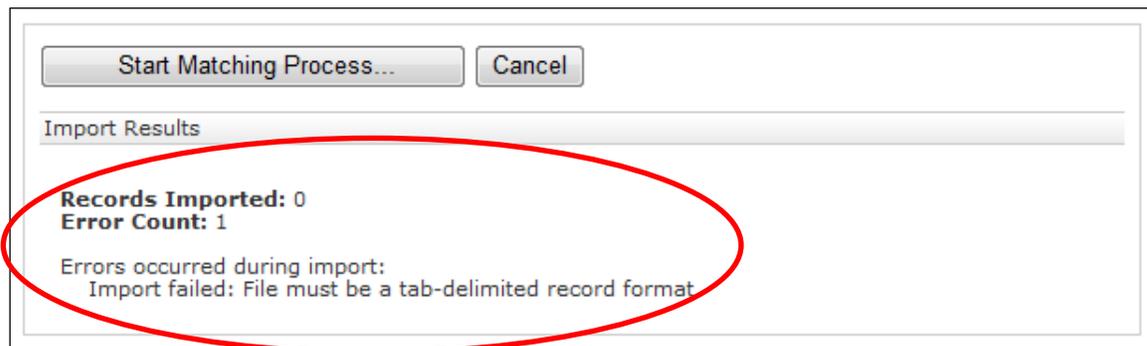


Figure 397. An Import Results message showing that errors occurred during import.

8. If import errors occurred, you will need to review your import file, verify that the file is correctly formatted, and correct any other problems before attempting to upload the file again. Once the file has been uploaded successfully, you can begin the matching process.

### 13.3. Conduct Matching

The fields you include in your student enrollment file determine the fields used by the Childrens Nutrition Direct Certification system to perform the matching process. A **match** occurs when 1) a student is confirmed to be enrolled and 2) at least two identifiers, such as full name (last name and first name) and birthdate, match. Because the inclusion of additional fields can increase the number of system-generated matches, sponsors are encouraged to include all available fields in their uploaded student enrollment files.

To conduct matching for a direct certification file:

1. Click the **Start Matching Process** button following the successful upload of a direct certification file.
2. When the matching process is complete, the CNDC system will display a summary of the results (Figure 398). Click the **Excel** or **Tab-Delimited** link to download your results report in spreadsheet or .txt file format, respectively, then **SAVE THE FILE**.
  - Paper file copies are permissible, but electronic files are recommended as a best practice. Remember that direct certification information is **confidential** and should be marked and stored accordingly.
  - For audit purposes, direct certification match results reports **MUST** be retrievable for three additional years after the end of the school year in which the file was generated and used.

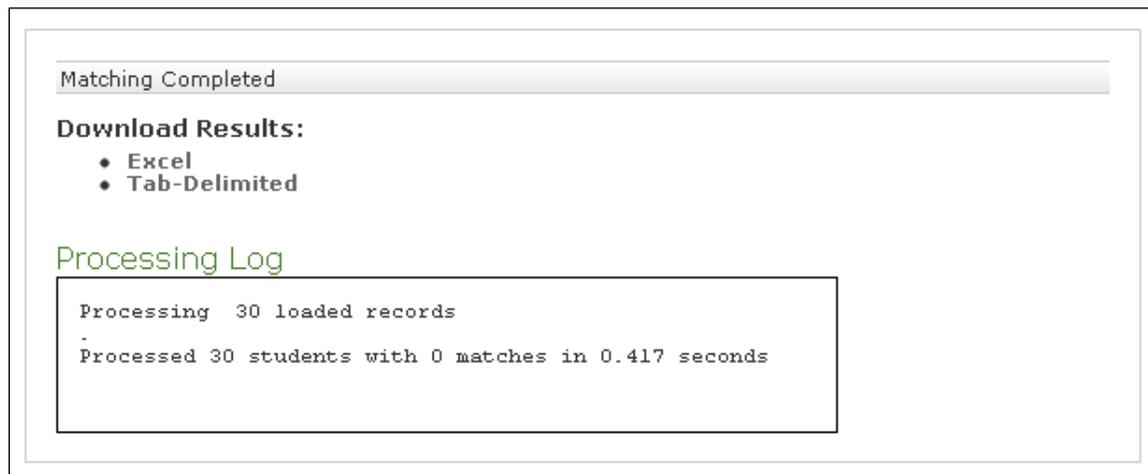


Figure 398. The direct certification matching results screen.

## 13.4. Single Student Lookup

To review information for an individual student:

1. On the Ohio Department of Education Childrens Nutrition Direct Certification (CNDC) Home page (Figure 399), click the **Search** tab.



Figure 399. The Ohio Department of Education Childrens Nutrition Direct Certification home page.

2. In the resulting screen you can enter **Last Name**, **First Name**, and **Date of Birth** of the student whose data you wish to review. Use the format **MM/DD/YYYY** for the student's date of birth. To strengthen the possibility of a resulting match, enter the **Parent Last Name**, **Parent First Name**, and **Address** into the appropriate data fields. (Figure 400).

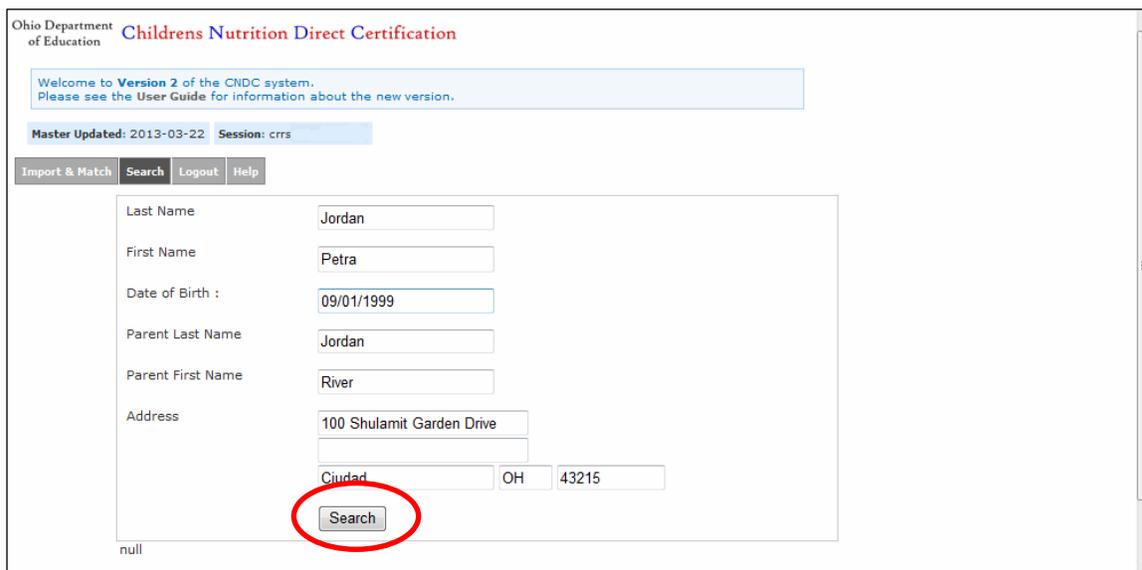
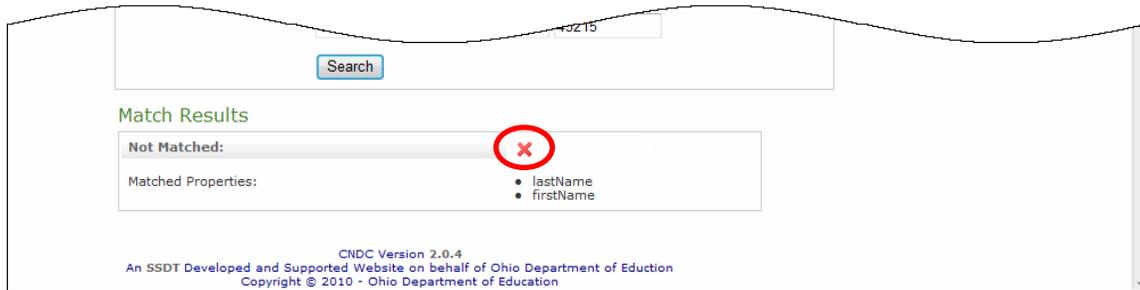


Figure 400. The Childrens Nutrition Direct Certification Search screen.

3. Click the **Search** button.

4. The Children's Nutrition Direct Certification Search screen redisplay to show a **Match Results** section below the data entry fields. If the individual student record produced a match, the **Match Results** section will display a green checkmark; a red X mark indicates no match (Figure 401). Print a copy of the results screen for the student record.



**Figure 401. The Childrens Nutrition Direct Certification Search screen showing the results of a student lookup.**